

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MBIA INC.,

Plaintiff, : Case No. 08 cv 4313 (RMB/DFE)

-against- : UNOPPOSED MOTION TO
ADMIT COUNSEL *PRO HAC VICE*

FEDERAL INSURANCE COMPANY and
ACE AMERICAN INSURANCE COMPANY,

Defendants.

-----x

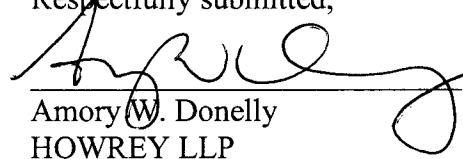
PURSUANT TO RULE 1.3(c) of the Local Rules of United States District Courts
for the Southern and Eastern Districts of New York, I, Amory Donelly, a member in good
standing the bar of this Court, hereby move for an Order allowing the admission *pro hac
vice* of :

ROBERT H. SHULMAN
Howrey LLP
1299 Pennsylvania Ave., NW
Washington, DC 20004
202.783.0800 (tel.)
202.383.6610 (fax)

Robert H. Shulman is a member of good standing of the Bar of the State of Louisiana and
the District of Columbia. There are no pending disciplinary proceedings against Mr.
Shulman in any State or Federal Court.

Dated: New York, New York
June 26, 2008

Respectfully submitted,



Amory W. Donelly
HOWREY LLP
Citigroup Center
153 East 53rd Street, 54th Floor
New York, New York 10022
(212) 896-6500 (tel.)
(914) 462-3280 (fax)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x

MBIA INC.,

:

Plaintiff, : Case No. 08 cv 4313 (RMB/DFE)

-against- : AFFIDAVIT OF AMORY W. DONELLY
IN SUPPORT OF MOTION TO

FEDERAL INSURANCE COMPANY and :
ACE AMERICAN INSURANCE COMPANY,

ADMIT COUNSEL *PRO HAC VICE*

Defendants.

:

-----x

STATE OF NEW YORK)
: ss.
COUNTY OF NEW YORK)

AMORY W. DONELLY, being duly sworn, hereby deposes and says as follows:

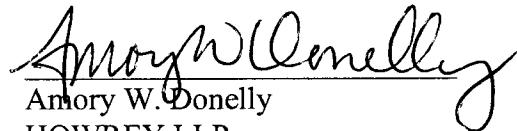
1. I am associated with Howrey LLP, counsel for plaintiff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of plaintiff's motion to admit Robert H. Shulman as counsel *pro hac vice* to represent plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York and was admitted to practice law on February 27, 2007. I am also admitted in the United States District Courts for the Southern and Eastern Districts of New York and am in good standing with these Courts.
3. I have known Robert H. Shulman since 2006.
4. Mr. Shulman is a member of Howrey LLP in Washington D.C.
5. Mr. Shulman is a member of the Bars of the State of Louisiana and the District of Columbia. (See Exhibits A & B annexed hereto).
6. I have found Mr. Shulman to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

7. This motion is unopposed. A true and accurate copy of an email from opposing counsel consenting to Mr. Shulman's admission *pro hac vice* is attached as Exhibit C.
8. Accordingly, I am pleased to move the admission of Mr. Shulman, *pro hac vice*.
9. I respectfully submit a proposed order granting the admission of Robert H. Shulman, *pro hac vice*, which is attached as Exhibit D.

WHEREFORE, I respectfully request that the motion to admit Robert H. Shulman, *pro hac vice*, to represent plaintiff in the above-captioned matter be granted.

Dated: New York, New York
June 26, 2008

Respectfully submitted,



Amory W. Donelly

HOWREY LLP

Citigroup Center

153 East 53rd Street, 54th Floor

New York, New York 10022

(212) 896-6500 (tel.)

(914) 462-3280 (fax)



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D.C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

ROBERT H. SHULMAN

was on the 7TH day of MARCH, 1980

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on June 25, 2008.

GARLAND PINKSTON, JR., CLERK

By: N. Charles
Deputy Clerk

United States of America

State of Louisiana

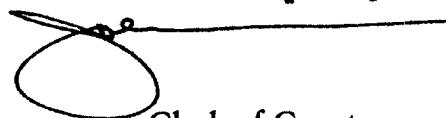
Supreme Court of the State of Louisiana

I, JOHN TARLTON OLIVIER, Clerk of the Supreme Court of the State of Louisiana, do hereby certify that

ROBERT H. SHULMAN, ESQ., #12049

was duly admitted and licensed to practice as an attorney and counselor at law in this Court and the several courts of the State of Louisiana, on the 28th Day of October, 1980 A.D.; and is currently in good standing, and sufficiently qualified to perform the duties of an attorney and counselor at law.

IN WITNESS WHEREOF, I hereunto sign
my name and affix the seal of this Court,
at the City of New Orleans, this the 10th
Day of June, 2008, A.D.



Clerk of Court
Supreme Court of Louisiana

Donelly, Amory

From: Joaquin, Alan J. [Alan.Joaquin@dbr.com]
Sent: Monday, June 23, 2008 11:12 AM
To: Donelly, Amory
Subject: RE: MBIA

ACE consents

From: Donelly, Amory [mailto:DonellyA@howrey.com]
Sent: Monday, June 23, 2008 10:12 AM
To: Joaquin, Alan J.; LRBonanno@HHLAW.com
Subject: MBIA

Lisa and Alan,

I am working with Christine Davis on *MBIA v. Federal* and am preparing a *pro hac vice* motion for Robert Shulman. Please advise via email if you consent to Mr. Shulman's admission *pro hac vice* in the S.D.N.Y. Of course, we will consent to any *pro hac* motions your firm files in this matter.

Thank you,

Amory W. Donelly
Associate

HOWREY LLP
Citigroup Center
153 East 53rd Street, 54th Floor
New York, NY 10022
Direct: +1 212.896.6595
Fax: +1 914.462.3280
DonellyA@howrey.com
www.howrey.com

Amsterdam Brussels Chicago East Palo Alto Houston Irvine London Los Angeles Madrid
Munich New York Northern Virginia Paris Salt Lake City San Francisco Taipei Washington DC

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Donelly, Amory

From: Zaetta, Christopher R. [CRZaetta@HHLAW.com]
Sent: Wednesday, June 25, 2008 11:05 AM
To: Donelly, Amory
Subject: RE: MBIA

Amory--We consent and will be filing pro hac vice motions of our own in which we will reflect MBIA's consent.
Thanks.

From: Donelly, Amory [mailto:DonellyA@howrey.com]
Sent: Wednesday, June 25, 2008 10:05 AM
To: Zaetta, Christopher R.
Subject: FW: MBIA

Chris,

I sent the below to Lisa but received an out of office message.

I am working with Christine Davis on *MBIA v. Federal* and am preparing a *pro hac vice* motion for Robert Shulman. Please advise via email if you consent to Mr. Shulman's admission *pro hac vice* in the S.D.N.Y. Of course, we will consent to any *pro hac* motions your firm files in this matter.

Thank you,

Amory W. Donelly
Associate

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Amsterdam Brussels Chicago East Palo Alto Houston Irvine London Los Angeles Madrid
Munich **New York** Northern Virginia Paris Salt Lake City San Francisco Taipei Washington DC

From: Donelly, Amory
Sent: Monday, June 23, 2008 10:12 AM
To: Alan.Joaquin@dbr.com; LRBonanno@HHLAW.com
Subject: MBIA

Lisa and Alan,

I am working with Christine Davis on *MBIA v. Federal* and am preparing a *pro hac vice* motion for Robert Shulman. Please advise via email if you consent to Mr. Shulman's admission *pro hac vice* in the S.D.N.Y. Of course, we will consent to any *pro hac* motions your firm files in this matter.

Thank you,

Amory W. Donelly

Associate

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Munich **New York** Northern Virginia Paris Salt Lake City San Francisco Taipei Washington DC

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"EMF <HHLAW.COM>" made the following annotations.

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If you have received this electronic transmission in error, please notify us by telephone.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MBIA INC.,	:	
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Plaintiff,	:	Case No. 08 cv 4313 (RMB/DFE)
-against-	:	ORDER FOR ADMISSION <i>PRO HAC VICE</i>
FEDERAL INSURANCE COMPANY and ACE AMERICAN INSURANCE COMPANY,	:	ON WRITTEN MOTION
	:	
Defendants.	:	
	:	

-----x

Upon the motion of Amory W. Donelly attorney for Plaintiff MBIA INC. and said sponsor attorney's affidavit in support:

IT IS HEREBY ORDERED that

Robert H. Shulman
Howrey LLP
1299 Pennsylvania Ave., NW
Washington, DC 20004
202.783.0800 (tel.)
202.383.6610 (fax)

is admitted to practice *pro hac vice* to represent MBIA INC. in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: New York, New York
June ___, 2008

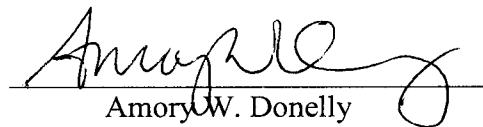
Hon. Douglas F. Eaton
United States Magistrate Judge

The undersigned hereby certifies that a true and accurate copy of the preceding documents was sent in the manner described below to the following attorneys on this 26th day of June 2008.

David J. Hensler
Lisa R. Bonanno
Hogan & Hartson LLP
Columbia Square
555 Thirteenth Street, NW
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202.637.5600
DJHensler@hhlaw.com
LRBonanno@hhlaw.com
BY REGULAR MAIL

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BY REGULAR MAIL
Attorneys for Defendant
Federal Insurance Company

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BY REGULAR MAIL
Attorneys for Defendant
Ace American Insurance Company



Amory W. Donelly

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MBIA INC.,	:	
	:	
Plaintiff,	:	Case No. 08 cv 4313 (RMB/DFE)
-against-	:	ORDER FOR ADMISSION <i>PRO HAC VICE</i>
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Dated: New York, New York
 June ___, 2008

Hon. Douglas F. Eaton
 United States Magistrate Judge